

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
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)	
Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications)	PS Docket No. 11-153
)	
Framework for Next Generation 911 Deployment)	PS Docket No. 10-255
)	

REPLY COMMENTS OF VERIZON

The Maine PUC correctly calls attention to the need for stakeholder collaboration in identifying the boundaries of responsibility as the nation's 911 systems evolve to incorporate real time texts to 911 and other IP-enabled technologies. However, it would inappropriately alter the interim framework developed between industry and the public safety community that launched the successful and still-growing deployment of text-to-911 throughout the country. In the years since Verizon participated in the first trial of text-to-911 service in Durham, North Carolina, and voluntarily developed and began deploying its own text-to-911 solution,¹ Verizon has deployed text-to-911 to nearly 1000 PSAPs in 42 states. This success story resulted from the voluntary framework NENA, APCO, and the nationwide carriers agreed upon and that the Commission

¹ See Verizon Press Release, *Verizon Selects TeleCommunications Systems to Provide Text to 911 National Gateway Solution* (May 3, 2012); News Release, *Durham 911 Center Launches Texting Trial for Emergency Help* (Aug. 3, 2011), available at <http://www.durhamnc.gov/news/NewsDisplay.cfm?vNewsID=2343>.

later incorporated into its rules.² The Commission endorsed the approach as an interim text-to-911 method that would be technically feasible, serve public safety, and not inhibit development and deployment of NG9-1-1.³ The Commission should leave that success intact, while also looking forward to services like real time text in the NG9-1-1 environment.

I. THE INTERIM TEXT-TO-911 FRAMEWORK LAUNCHED TIMELY TEXT-TO-911 DEPLOYMENT.

Verizon's widespread text-to-911 deployment shows that the Commission's adoption of the text-to-911 framework has been a success. A key part of that framework was service providers' creation of a Text Control Center ("TCC") that enabled consumers to use existing SMS technology to send 911 texts to PSAPs in the short term, without requiring either service providers or PSAPs to deploy new costly architectures. And just as clear, as CTIA and other commenters explain, was that a PSAP would bear responsibility for facilities and functions on its side of the TCC.⁴ This delineation of responsibility resulted from collaborative public safety and industry guidelines and practices that the Commission subsequently ratified.⁵ So under the

² See Letter from APCO, NENA, AT&T, Sprint Nextel, T-Mobile, and Verizon, PS Docket Nos.11-153 and 10-255 (Dec. 6, 2012).

³ *Facilitating the Deployment of text-to-911 and Other Next Generation 911 Applications, Framework for Next Generation 911 Deployment*, Second Report and Order and Third Further Notice of Proposed Rulemaking, 29 FCC Rcd. 9846 (2014) ("*Text-to-911 Order*").

⁴ See CTIA Comments at 3-6; AT&T Comments at 3; Comtech Comments at 5-6; *see also* Texas 911 Entities Comments at 4-5.

⁵ See CTIA Comments at 4-5, nn 5-7 (citing *Facilitating the Deployment of text-to-911 and Other Next Generation 911 Applications, Framework for Next Generation 911 Deployment*, Policy Statement and Second Further Notice of Proposed Rulemaking, 29 FCC Rcd. 1547, ¶ 8 (2014) (noting "PSAPs will select the format for how messages are to be delivered 'with incremental costs for delivery being the responsibility of the PSAP.'")).

Commission’s rules, a service provider is not obligated to deliver 911 texts to a PSAP that has not procured the necessary connection to the TCC.⁶

The Maine PUC incorrectly points to provisions in the Part 20 rules governing delivery of voice wireless 911 calls to a “Wireline 911 network.”⁷ As CTIA and AT&T explained, those rules do not apply to 911 texts. And analogizing the interim text-to-911 framework to the wireless voice architecture is inappropriate. The Maine PUC’s interpretation would treat the TCC as equivalent to a mobile switching center in the wireless network, which handles both 911 *and* non-emergency traffic. But like a wireline selective router for voice 911 calls, the TCC’s sole function is to enable SMS architecture to route 911 texts to PSAPs. Wireless carriers also mitigate the costs that a PSAP incurs to connect their advanced equipment and networks (referred to as “ESInets”) to the TCC by creating a single aggregation point for all service providers in the PSAP’s market—just like the wireline selective router. The TCC’s real counterpart in an ESInet architecture is thus the wireline selective router, and PSAPs are responsible for costs on their side of the wireline selective router. The Maine PUC’s reliance on *King County* is incorrect for this same reason.⁸

Although the cost responsibility in the interim text-to-911 delivery configuration is settled law,⁹ commenters raise issues for stakeholders to address as the industry and PSAPs

⁶ *Text-to-911 Order*, ¶ 54 n.160 (PSAP is not presumably “text-ready” if it has not “undertaken the best practices referenced in CSRIC’s report”).

⁷ AT&T Comments at 1-2; CTIA Comments at 6-7; *see also* NENA Comments at 2 (“King County Letter was specific to [selective routers] maintained by ILECS”).

⁸ CTIA Comments at 6-8; AT&T Comments at 2-3; Comtech Comments at 6.

⁹ *See Armstrong Utilities, Inc. and StogMedia, LLC*, Memorandum Opinion and Order, 25 FCC Rcd. 3717, ¶ 3 (MB 2010) (declaratory ruling “inappropriate where there is existing precedent to guide the parties”).

move to IP-enabled services like real time text and NG9-1-1 platforms, respectively. The Commission can play a constructive role in moving those efforts forward.

II. STAKEHOLDERS SHOULD BUILD UPON PREVIOUS COLLABORATIVE EFFORTS TO DEVELOP ADDITIONAL CONNECTIVITY BEST PRACTICES FOR FULLY INTEGRATED MULTIMEDIA NG9-1-1 SERVICES.

Several industry and public safety commenters correctly explain that different network architectures and service provider and PSAP capabilities may warrant alternative approaches as we move away from the interim TCC delivery configuration toward a “fully integrated, multimedia NG9-1-1” environment.¹⁰ Certain principles underlying *King County* may provide more useful guidance in those cases. The “ingress point of the terminating 9-1-1 network”¹¹ will be more apparent when, unlike interim text-to-911, the originating network is standardized from the outset to support 911 emergency communications and the PSAP’s NG9-1-1 network more fully incorporates all the functions of the wireline 911 network. Certain factors, though—including differences among originating access services and networks, PSAP resources and vendors, and PSAP governance structures—may preclude the use of “one size fits all” approach for every individual service provider and PSAP connectivity arrangement. So stakeholders should focus on developing consensus-driven, adaptable best practices.

Industry and public safety stakeholders have already made meaningful progress toward a more uniform understanding of NG9-1-1 roles and responsibilities through earlier collaborative efforts.¹² As NENA notes in its comments, public safety and industry stakeholders have

¹⁰ AT&T Comments at 3; *see* Comtech Comments at 7; CTIA Comments at 8-9; Texas 911 Entities Comments at 2-3 NENA Comments at 3-4.

¹¹ *See* NENA Comments at 2.

¹² *See, e.g.,* NENA, *Potential Points of Demarcation in NG9-1-1 Networks Information Document*, NENA-INF-003 (2013); Task Force on Optimal Public Safety Answering Point

previously urged the Commission to establish or support a workshop or similar forum to discuss important NG9-1-1 implementation issues such as these. And service providers and PSAPs now have additional experience with limited ESInet deployments that can inform these deliberations. The Commission should promote public safety and industry stakeholder efforts to build upon these initiatives and experiences.

Respectfully submitted,

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Architecture (TFOPA), *Working Group 2 Report: Optimal 9-1-1 Service Architecture* (Dec. 2015).